

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 04-80887-01

HON. AVERN COHN

V.

ROBERT SAGAN,

Defendant.

MOTION TO SEAL

NOW COMES Defendant Robert Sagan, by and through his attorney, Michael J. Kemnitz, and respectfully moves this Honorable Court to enter an order sealing Defendant's pleading filed on Wednesday, November 15, 2006, and that said pleadings be sealed until further order of this Court.

On November 15, 2006, undersigned counsel sought the concurrence of Assistant United States Attorney Daniel Lemisch in the relief requested herein and such concurrence was granted.

Respectfully submitted,

s/ Michael J. Kemnitz
Michael J. Kemnitz (P57227)
Attorney for Robert Sagan
645 Griswold, Suite, 1717
Detroit, Michigan 48226
(313) 967-0100
Email: mkemnitz@sbcglobal.net

Dated: November 14, 2006

UNITED STATES OF AMERICA
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 04-80887-01
HON. AVERN COHN

ROBERT SAGAN,

Defendants.

_____ /

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2006, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Daniel Lemisch
Assistant U.S. Attorney
211 West Fort Street, Suite 2001
Detroit, MI 48226
daniel.lemisch@usdoj.gov

s/ Michael J. Kemnitz
MICHAEL J. KEMNITZ (P57227)
Attorney for Robert Sagan
645 Griswold, Suite 1717
Detroit, MI 48226
313-967-0100
Email: mkemnitz@sbcglobal.net